

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Consumer Financial Protection Bureau,

Plaintiff,

v.

Universal Debt & Payment Solutions, LLC;
Universal Debt Solutions, LLC; WNY
Account Solutions Group, LLC; Check &
Credit Recovery, LLC; Credit Power,
LLCs; S Payment Processing & Solutions,
LLC; Marcus Brown; Mohan Bagga; Sarita
Brown; Tasha Pratcher; Varinderjit Bagga;
Sumant Khan; Global Payments, Inc.;
Pathfinder Payment Solutions, Inc.;
Frontline Processing Corp.; Francis David
Corp. d/b/a Electronic Merchant Systems;
and Global Connect, LLC,

Defendants.

Civil Action File No.:
1:15-CV-0859

**ANSWER AND AFFIRMATIVE DEFENSES OF
DEFENDANT FRONTLINE PROCESSING CORP.**

Defendant Frontline Processing Corp. (“Frontline”), by and through its undersigned counsel, without assuming any burden that is not otherwise appropriately placed on it, for its Answer and Affirmative Defenses to the Complaint filed against it in the above-captioned action, responds and answers as follows.

INTRODUCTION

Frontline denies all allegations of wrongdoing and any liability on the claims asserted by Plaintiff the Consumer Financial Protection Bureau (the “CFPB” or “Plaintiff”). Frontline is a Montana-based company that has operated in the payment processing industry since 1997. As relevant to this litigation, Frontline is an Independent Sales Organization (“ISO”) of Defendant Global Payments, Inc. (“Global Payments”). As an ISO of Global Payments, the obligations and duties owed by Frontline were those set forth in the Merchant Services Agreement with Global Payments. As alleged by the CFPB, at the time Frontline submitted merchant applications of Credit Power and UDPS to Global Payments, Global Payments had already been processing transactions for those merchants for approximately two years. The decision to approve the merchant applications of UDPS and Credit Power was held by Global Payments pursuant to the terms of the Merchant Services Agreement. Frontline affirmatively alleges that it did not breach any obligation or duty owed to Global Payments by forwarding the merchant applications to Global Payments for its review and approval.

Frontline specifically denies that it provided substantial assistance to any alleged acts or conduct of Credit Power or UDPS or any other alleged violation of the FDCPA or the CFPA alleged by the CFPB in this case. Frontline did not

process the transactions that form the basis of the CFPB's claims. According to the CFPB's allegations, Global Payments processed the relevant transactions. Credit Power and UDPS were merchants of Global Payments. The CFPB attempts to impose strict liability on Frontline in this action for alleged fraudulent conduct, statutory violations and wrongdoing of others—a liability unsupported in the law that will be proven to be unsupported by the facts.

RESPONSE TO SPECIFIC ALLEGATIONS

With respect to the allegations set forth in the CFPB's Complaint, Frontline denies each and every allegation against it unless otherwise specifically admitted herein. Frontline objects to the CFPB's use of the term "Payment Processors" throughout the entirety of the Complaint as inaccurate, vague, ambiguous, and improperly conflating the unique and separate contractual obligations, roles and duties owed by Frontline with other named Defendants. Subject to all defenses, Frontline responds to the specific allegations of Plaintiff's Complaint as follows:

1. Frontline admits that the CFPB commenced this action pursuant to the statutes identified in Paragraph 1 to obtain injunctive relief and recover damages from Frontline, but Frontline denies all liability and claims asserted against it.
2. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 2 of the Complaint.

3. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3 of the Complaint.

4. Frontline denies the allegations contained in Paragraph 4 of the Complaint.

5. Frontline denies the allegations contained in Paragraph 5 of the Complaint.

6. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6 of the Complaint.

7. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 7 of the Complaint.

RESPONSE TO JURISDICTION AND VENUE

8. Paragraph 8 contains conclusions of law to which no affirmative response is required. Frontline admits the Court has subject matter jurisdiction over this action.

9. Paragraph 9 contains conclusions of law to which no affirmative response is required. Frontline admits venue of this litigation is proper in the Northern District of Georgia.

RESPONSE TO PARTIES

10. Paragraph 10 does not contain any allegations against Frontline. Frontline denies the allegations contained in Paragraph 10 of the Complaint as legal conclusions to which no response is required.

Response to Debt Collectors.

11. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 11 of the Complaint.

12. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 12 of the Complaint.

13. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 13 of the Complaint.

14. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 14 of the Complaint.

15. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 15 of the Complaint.

16. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 16 of the Complaint.

17. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 17 of the Complaint.

18. Frontline admits that certain entities are collectively referred to in the Complaint as UDPS. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 18 of the Complaint.

19. Paragraph 19 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 19 of the Complaint.

20. Paragraph 20 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 20 of the Complaint.

21. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 21 of the Complaint.

22. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 22 of the Complaint.

23. Paragraph 23 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks

knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 23 of the Complaint.

24. Paragraph 24 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 24 of the Complaint.

25. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 25 of the Complaint.

26. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 26 of the Complaint.

27. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 27 of the Complaint.

28. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 28 of the Complaint.

29. Frontline admits that certain entities are collectively referred to as WNY in the Complaint. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 29 of the Complaint.

30. Paragraph 30 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 30 of the Complaint.

31. Paragraph 31 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 31 of the Complaint.

32. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 32 of the Complaint.

33. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 33 of the Complaint.

34. Paragraph 34 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 34 of the Complaint.

35. Paragraph 35 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks

knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 35 of the Complaint.

36. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 36 of the Complaint.

37. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 37 of the Complaint.

38. Paragraph 38 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 38 of the Complaint.

39. Paragraph 39 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 39 of the Complaint.

40. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 40 of the Complaint.

41. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 41 of the Complaint.

42. Paragraph 42 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 42 of the Complaint.

43. Paragraph 43 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 43 of the Complaint.

44. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 44 of the Complaint.

45. Frontline admits that certain entities are collectively referred to in the Complaint as the Debt Collector LLCs.

46. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 46 of the Complaint.

47. Paragraph 47 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 47 of the Complaint.

48. Paragraph 48 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 48 of the Complaint.

49. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 49 of the Complaint.

50. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 50 of the Complaint.

51. Paragraph 51 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 51 of the Complaint.

52. Paragraph 52 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 52 of the Complaint.

53. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 53 of the Complaint.

54. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 54 of the Complaint.

55. Paragraph 55 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 55 of the Complaint.

56. Paragraph 56 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 56 of the Complaint.

57. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 57 of the Complaint.

58. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 58 of the Complaint.

59. Paragraph 59 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 59 of the Complaint.

60. Paragraph 60 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 60 of the Complaint.

61. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 61 of the Complaint.

62. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 62 of the Complaint.

63. Paragraph 63 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 63 of the Complaint.

64. Paragraph 64 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 64 of the Complaint.

65. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 65 of the Complaint.

66. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 66 of the Complaint.

67. Paragraph 67 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 67 of the Complaint.

68. Paragraph 68 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 68 of the Complaint.

69. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 69 of the Complaint.

70. Frontline admits that the individual defendants and entities referred to as “Debt Collector LLCs” are collectively referred to in the Complaint as the “Debt Collectors.”

71. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 71 of the Complaint.

72. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 72 of the Complaint.

73. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 73 of the Complaint.

74. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 74 of the Complaint.

75. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 75 of the Complaint.

Response to Payment Processors.

76. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 76 of the Complaint.

77. Paragraph 77 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 77 of the Complaint.

78. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 78 of the Complaint.

79. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 79 of the Complaint.

80. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 80 of the Complaint.

81. Paragraph 81 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 81 of the Complaint.

82. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 82 of the Complaint.

83. Frontline admits the allegations contained in Paragraph 83 of the Complaint.

84. Frontline admits that the obligations owed by Frontline pursuant to the Merchant Services Agreement between Frontline and Global (the “MSA”) are defined by the terms of the MSA, which is a written document that speaks for itself. Frontline admits that it entered into an MSA with Global, as later amended, and refers the CFPB to the MSA for its terms. Frontline denies the allegations contained in Paragraph 84 of the Complaint to the extent they are inconsistent with the MSA.

85. Frontline denies the allegations contained in Paragraph 85 of the Complaint.

86. Frontline denies the allegations contained in Paragraph 86 of the Complaint.

87. The obligations owed by Frontline pursuant to the MSA are defined by the terms of the MSA, which is a written document that speaks for itself. Frontline admits that it entered into an MSA with Global, as later amended, and refers the CFPB to the MSA for its terms. Frontline admits that pursuant to the terms of the MSA, Frontline is referred to as an Independent Sales Organization of Global.

88. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 88 of the Complaint.

89. Paragraph 89 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 89 of the Complaint.

90. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 90 of the Complaint.

Response to Telephone Broadcast Service Provider.

91. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 91 of the Complaint.

92. Paragraph 92 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks

knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 92 of the Complaint.

93. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 93 of the Complaint.

RESPONSE TO FACTUAL ALLEGATIONS

Response to the Alleged Debt Collection Scheme.

With respect to Paragraphs 94 through 100 of the Complaint, Frontline specifically denies any knowledge of any fraudulent, unlawful, or illegal activity or any ongoing scheme to defraud conducted or operated by any of the named defendants in this litigation.

94. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 94 of the Complaint.

95. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 95 of the Complaint.

96. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 96 of the Complaint.

97. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 97 of the Complaint.

98. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 98 of the Complaint.

99. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 99 of the Complaint.

100. Frontline denies that it processed payments or facilitated the withdrawal of funds from the consumer's account or facilitated the deposit of funds into the Debt Collector's accounts. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 100 of the Complaint.

Response to Obtaining consumers' information.

With respect to Paragraphs 101 through 106 of the Complaint, Frontline specifically denies any knowledge of any fraudulent, unlawful, or illegal activity or any ongoing scheme to defraud conducted or operated by any of the named defendants in this litigation.

101. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 101 of the Complaint.

102. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 102 of the Complaint.

103. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 103 of the Complaint.

104. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 104 of the Complaint.

105. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 105 of the Complaint.

106. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 106 of the Complaint.

Response to Contacting consumers.

With respect to Paragraphs 107 through 119 of the Complaint, Frontline specifically denies any knowledge of any fraudulent, unlawful, or illegal activity or any ongoing scheme to defraud conducted or operated by any of the named defendants in this litigation.

107. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 107 of the Complaint.

108. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 108 of the Complaint.

109. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 109 of the Complaint.

110. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 110 of the Complaint.

111. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 111 of the Complaint.

112. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 112 of the Complaint.

113. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 113 of the Complaint.

114. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 114 of the Complaint.

115. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 115 of the Complaint.

116. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 116 of the Complaint.

117. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 117 of the Complaint.

118. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 118 of the Complaint.

119. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 119 of the Complaint.

Response to “the individual defendants were personally engaged in the unlawful scheme.”

With respect to Paragraphs 120 through 143 of the Complaint, Frontline specifically denies any knowledge of any fraudulent, unlawful, or illegal activity or any ongoing scheme to defraud conducted or operated by any of the named defendants in this litigation.

120. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 120 of the Complaint.

121. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 121 of the Complaint.

122. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 122 of the Complaint.

123. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 123 of the Complaint.

124. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 124 of the Complaint.

125. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 125 of the Complaint.

126. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 126 of the Complaint.

127. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 127 of the Complaint.

128. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 128 of the Complaint.

129. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 129 of the Complaint.

130. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 130 of the Complaint.

131. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 131 of the Complaint.

132. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 132 of the Complaint.

133. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 133 of the Complaint.

134. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 134 of the Complaint.

135. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 135 of the Complaint.

136. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 136 of the Complaint.

137. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 137 of the Complaint.

138. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 138 of the Complaint.

139. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 139 of the Complaint.

140. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 140 of the Complaint.

141. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 141 of the Complaint.

142. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 142 of the Complaint.

143. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 143 of the Complaint.

Response to the Payment Processors and the Debt Collection Scheme.

With respect to Paragraphs 144 through 151 of the Complaint, Frontline specifically objects to the use of the phrase “Payment Processors” as vague, ambiguous and improperly conflating the acts and knowledge of Frontline with other named defendants, including Global Payments and Pathfinder. Frontline refers the CFPB to the MSA, which is the only source of duties and obligations owed by Frontline, all of which were owed, if at all, to Global Payments. Frontline affirmatively alleges that it fulfilled all duties owed to Global Payments in accordance with the terms of the MSA and that no damages or consumer harm alleged in this litigation were the result of any act or conduct of Frontline, but rather intentional fraud orchestrated by other defendants or the negligence and/or breach of duties owed by Global Payments. Frontline specifically denies that it assisted or “substantially assisted” any conduct that was unlawful or in violation of the CFPA or the FDCPA.

144. Frontline admits that payment processors provide services that enable merchants to accept electronic payments at a point of sale.

145. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 145 of the Complaint.

146. Frontline denies the allegations of Paragraph 146 of the Complaint.

147. Frontline admits the allegations contained in Paragraph 147 of the Complaint.

148. Frontline admits the allegations contained in Paragraph 148 of the Complaint.

149. Frontline admits the allegations contained in Paragraph 149 of the Complaint.

150. The diagram and flow chart set forth in paragraph 150 is not capable of a factual response, and Frontline therefore denies the same.

151. Frontline denies the allegations contained in Paragraph 151, and Frontline specifically denies providing any services that enabled Credit Power or UDPS, or any other merchant, to process consumer payments in violation of the FDCPA or the CFPA.

Response to the Payment Processors and ISO's policies and procedures.

152. Frontline admits that, as in any industry, there is credit exposure and risk in the payment processing industry. Frontline denies the remaining allegations in Paragraph 152.

153. Frontline admits that consumers can dispute charges and that chargebacks can and do occur within the payment processing industry. Frontline denies the remaining allegations in Paragraph 153.

154. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 154 of the Complaint.

155. Frontline admits that there are policies and procedures in the payment processing industry and affirmatively alleges that it abided by and complied with all policies and procedures relevant or applicable to Frontline. Frontline denies the remaining allegations in Paragraph 155.

156. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 156 of the Complaint.

157. As to the allegations in paragraph 157, Frontline refers the CFPB to the terms of the credit policy of Global Payments, which is a written document that speaks for itself. Frontline denies that collection agencies were “prohibited merchants” as that phrase is used by the CFPB. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 157 of the Complaint.

158. As to the allegations in paragraph 158, Frontline refers the CFPB to the terms of the contracts and respective Merchant Service Agreements entered into between Pathfinder and Global Payments and Frontline and Global Payments, which are separate and distinct written documents that speak for themselves. Frontline admits and agrees that Frontline did not deem collection agencies to be

prohibited merchants and violated no written policy or agreement in prescreening any such merchants for consideration and ultimate approval by Global Payments.

159. The allegations in paragraph 159 are vague and ambiguous and incapable of a factual response. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 159 of the Complaint.

160. As to the allegations in paragraph 160, Frontline refers the CFPB to the terms of the credit policy of Global Payments, which is a written document that speaks for itself. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 160 of the Complaint.

161. As to the allegations in paragraph 161, Frontline refers the CFPB to the terms of the credit policy of Global Payments, which is a written document that speaks for itself. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 161 of the Complaint.

162. Frontline denies the allegations contained in Paragraph 162 of the Complaint.

163. As to the allegations in paragraph 163, Frontline refers the CFPB to the terms of the credit policy of Global Payments, which is a written document that speaks for itself. Frontline denies the allegations contained in Paragraph 163 to the extent they are inconsistent with the written policy.

164. Frontline admits that it did not deem collection agencies to be prohibited merchants and violated no written policy or agreement in prescreening any such merchants for consideration and ultimate approval by Global Payments. Frontline affirmatively alleges that under the express terms of its MSA with Global Payments, the ultimate decision to approve any merchant was at all times held by Global Payments and Frontline's contractual obligation and duty was limited to prescreening merchants and forwarding for consideration, review and approval by Global Payments. Frontline denies the remaining allegations contained in Paragraph 164 of the Complaint.

Response to Pathfinder's underwriting and risk monitoring.

165. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 165 of the Complaint.

166. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 166 of the Complaint.

167. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 167 of the Complaint.

168. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 168 of the Complaint.

169. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 169 of the Complaint.

170. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 170 of the Complaint.

171. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 171 of the Complaint.

172. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 172 of the Complaint.

173. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 173 of the Complaint.

174. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 174 of the Complaint.

175. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 175 of the Complaint.

176. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 176 of the Complaint.

177. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 177 of the Complaint.

178. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 178 of the Complaint.

179. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 179 of the Complaint.

180. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 180 of the Complaint.

181. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 181 of the Complaint.

182. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 182 of the Complaint.

183. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 183 of the Complaint.

184. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 184 of the Complaint.

185. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 185 of the Complaint.

186. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 186 of the Complaint.

187. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 187 of the Complaint.

188. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 188 of the Complaint.

189. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 189 of the Complaint.

190. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 190 of the Complaint.

191. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 191 of the Complaint.

192. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 192 of the Complaint.

193. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 193 of the Complaint.

194. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 194 of the Complaint.

195. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 195 of the Complaint.

Response to Frontline's underwriting and risk monitoring.

196. Frontline admits the allegations contained in Paragraph 196.

197. As to Paragraph 197, Frontline admits that it is an Independent Sales Organization of Global Payments pursuant to the terms of the 2001 Merchant Services Agreement, as later amended. Frontline refers the CFPB to the terms of the credit policy of Global Payments, which is a written document that speaks for itself, and denies the allegations of Paragraph 197 to the extent they contradict the terms of that policy. Frontline admits that collection agencies are not prohibited merchants by Frontline's policies and procedures.

198. Frontline admits the allegations of Paragraph 198 of the Complaint.

199. Frontline denies the allegations contained in Paragraph 199 of the Complaint.

200. Frontline admits the allegations contained in Paragraph 200 of the Complaint.

201. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 201 of the Complaint.

202. As to Paragraph 202, the application and voided check referenced speak for themselves, and Frontline denies the allegations of Paragraph 202 to the extent they are inconsistent with those documents. Frontline affirmatively denies any knowledge of impropriety or fraud at the time Frontline received merchant applications from UDPS and Credit Power. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 202 of the Complaint.

203. Frontline admits the allegations contained in Paragraph 203 of the Complaint.

204. As to Paragraph 204, Frontline states that the underwriting summary referenced is a written document that speaks for itself. Frontline admits that the underwriting summary includes the content selectively quoted by the CFPB.

205. As to Paragraph 205, Frontline states that the underwriting summary referenced is a written document that speaks for itself. Frontline admits that the underwriting summary includes the content selectively quoted by the CFPB.

206. As to Paragraph 206, Frontline states that the underwriting summary referenced is a written document that speaks for itself. Frontline admits that the underwriting summary includes the content selectively quoted by the CFPB.

207. Frontline admits that Global Payments approved the merchant application submitted by UDPS and that the decision to approve Global Payments as a merchant at all times was held by Global Payments. On information and belief, at the time Global Payments approved UDPS, it had been processing payments for UDPS in the debt collection industry since 2011.

208. Frontline admits the allegations contained in Paragraph 208 of the Complaint.

209. As to Paragraph 209, Frontline states that the application is a written document that speaks for itself and denies the allegations of Paragraph 209 to the extent they are inconsistent with that written document. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 209 of the Complaint.

210. As to Paragraph 210, Frontline states that the application is a written document that speaks for itself and denies the allegations of Paragraph 210 to the extent they are inconsistent with that written document. Frontline lacks knowledge

or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 210 of the Complaint.

211. Frontline admits the allegations contained in Paragraph 211 of the Complaint.

212. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 212 of the Complaint. Frontline refers the CFPB to the BBB review referenced.

213. Frontline admits that the CFPB has selectively chosen to quote a small portion of Frontline's underwriting manual in Paragraph 213 of the Complaint.

214. Frontline admits that the CFPB has selectively chosen to quote a small portion of Frontline's underwriting manual in Paragraph 214 of the Complaint.

215. Frontline admits the allegations contained in Paragraph 215 of the Complaint.

216. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 216 of the Complaint.

217. Frontline denies the allegations contained in Paragraph 217 of the Complaint.

218. Frontline admits the allegations contained in Paragraph 218 of the Complaint. Frontline further states that UDPS had been processing payments

through Global Payments for nearly two years prior to submitting an application to Frontline.

Response to Global Payments, Pathfinder, and Frontline and corresponding allegations with respect to UDPS and Credit Power.

219. Frontline admits that consumers can dispute charges and that chargebacks can and do occur within the payment processing industry. Frontline otherwise denies the allegations in Paragraph 219 of the Complaint.

220. In response to Paragraph 220, Frontline states that under its MSA with Global, at all relevant times Global was responsible for investigating and handling chargebacks and refers the CFPB to the terms of the MSA with respect to any obligations owed by Frontline. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 220 of the Complaint.

221. In response to Paragraph 221, Frontline states that under its MSA with Global, at all relevant times Global was responsible for investigating and handling chargebacks and refers the CFPB to the terms of the MSA with respect to any obligations owed by Frontline. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in Paragraph 221 of the Complaint.

222. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 222 of the Complaint.

223. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 223 of the Complaint.

224. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 224 of the Complaint.

225. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 225 of the Complaint.

226. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 226 of the Complaint.

227. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 227 of the Complaint.

228. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 228 of the Complaint.

229. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 229 of the Complaint.

230. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 230 of the Complaint.

231. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 231 of the Complaint.

232. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 232 of the Complaint.

233. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 233 of the Complaint.

234. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 234 of the Complaint.

235. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 235 of the Complaint.

236. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 236 of the Complaint.

237. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 237 of the Complaint.

238. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 238 of the Complaint.

239. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 239 of the Complaint.

240. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 240 of the Complaint.

241. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 241 of the Complaint.

242. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 242 of the Complaint.

243. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 243 of the Complaint.

244. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 244 of the Complaint.

245. Frontline denies the allegations contained in Paragraph 245 of the Complaint.

246. Frontline denies the allegations contained in Paragraph 246 of the Complaint.

Response to EMS's underwriting and risk monitoring

247. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 247 of the Complaint.

248. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 248 of the Complaint.

249. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 249 of the Complaint.

250. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 250 of the Complaint.

251. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 251 of the Complaint.

252. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 252 of the Complaint.

253. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 253 of the Complaint.

254. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 254 of the Complaint.

255. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 255 of the Complaint.

256. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 256 of the Complaint.

257. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 257 of the Complaint.

258. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 258 of the Complaint.

259. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 259 of the Complaint.

260. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 260 of the Complaint.

261. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 261 of the Complaint.

262. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 262 of the Complaint.

263. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 263 of the Complaint.

264. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 264 of the Complaint.

265. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 265 of the Complaint.

266. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 266 of the Complaint.

267. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 267 of the Complaint.

268. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 268 of the Complaint.

269. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 269 of the Complaint.

270. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 270 of the Complaint.

271. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 271 of the Complaint.

272. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 272 of the Complaint.

273. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 273 of the Complaint.

274. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 274 of the Complaint.

275. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 275 of the Complaint.

276. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 276 of the Complaint.

277. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 277 of the Complaint.

278. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 278 of the Complaint.

279. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 279 of the Complaint.

280. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 280 of the Complaint.

281. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 281 of the Complaint.

282. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 282 of the Complaint.

283. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 283 of the Complaint.

284. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 284 of the Complaint.

285. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 285 of the Complaint.

Response to “To continue their collection scheme, Brown, Varinderjit Bagga, and Khan opened additional processing accounts with another payment processor.”

286. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 286 of the Complaint.

287. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 287 of the Complaint.

288. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 288 of the Complaint.

289. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 289 of the Complaint.

290. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 290 of the Complaint.

291. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 291 of the Complaint.

**RESPONSE TO DEBT COLLECTORS’ ALLEGED VIOLATIONS
OF THE FDCPA AND CFPA**

Paragraphs 292 through Paragraphs 326 do not contain any allegations against Frontline. To the extent the CFPB sets forth conclusions of law related to

certain provisions of the CFPA, those statements of law do not require an affirmative or factual response by Frontline. Count I through Count VII are not alleged against Frontline. To the extent the CFPB asserts that Frontline substantially assisted any acts, conduct, or violations of the FDCPA or CFPA alleged against the Debt Collectors in Count I through Count VII, Frontline affirmatively asserts that it provided no assistance or substantial assistance to any named merchant or defendant, including Credit Power or UDPS. Frontline further affirmatively asserts that the only duties and obligations owed by Frontline with respect to the CFPB's claims, if any, were the contractual duties that Frontline owed to Global Payments pursuant to the terms of the MSA, all of which Frontline fulfilled.

RESPONSE TO DEBT COLLECTORS' VIOLATIONS
OF THE FDCPA

292. Paragraph 292 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 292 of the Complaint.

293. Frontline admits the allegations contained in Paragraph 293 of the Complaint.

294. Frontline admits the allegations contained in Paragraph 294 of the Complaint.

**Response to Count I: Harassment and Abuse in Connection with
Collection of a Debt**

295. In response to the allegations contained in Paragraph 295 of the Complaint, Frontline incorporates by reference the responses to Paragraphs 1-294 contained herein.

296. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 296 of the Complaint.

297. Paragraph 297 contains conclusions of law to which no affirmative response is required.

**Response to Count II: Using False, Deceptive, and Misleading
Representations to Collect a Debt**

298. In response to the allegations contained in Paragraph 298 of the Complaint, Frontline incorporates by reference the responses to Paragraphs 1-297 contained herein.

299. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 299 of the Complaint.

300. Paragraph 300 contains conclusions of law to which no affirmative response is required.

Response to Count III: Failing to Validate Debts

301. In response to the allegations contained in Paragraph 301 of the Complaint, Frontline incorporates by reference the responses to Paragraphs 1-300 contained herein.

302. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 302 of the Complaint.

303. Paragraph 303 contains conclusions of law to which no affirmative response is required.

RESPONSE TO THE CONSUMER FINANCIAL PROTECTION ACT

304. In response to the allegations contained in Paragraph 304, Frontline states that 12 U.S.C. § 5554(a) does not exist. Frontline admits the remaining allegations contained in Paragraph 304 of the Complaint.

305. Frontline admits the allegations contained in Paragraph 305 of the Complaint.

306. Frontline admits the allegations contained in Paragraph 306 of the Complaint.

307. Paragraph 307 contains conclusions of law to which no affirmative response is required.

RESPONSE TO DEBT COLLECTORS' VIOLATIONS OF THE CFPA

Response to Count IV: Violations of the FDCPA

308. In response to the allegations contained in Paragraph 308 of the Complaint, Frontline incorporates by reference the responses to Paragraphs 1-307 contained herein.

309. Frontline admits the allegations contained in Paragraph 309 of the Complaint.

310. Paragraph 310 contains conclusions of law to which no affirmative response is required.

311. Paragraph 311 contains conclusions of law to which no affirmative response is required.

Response to Count V: Deceptive Acts or Practices

312. In response to the allegations contained in Paragraph 312 of the Complaint, Frontline incorporates by reference the responses to Paragraphs 1-311 contained herein.

313. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 313 of the Complaint.

314. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 314 of the Complaint.

315. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 315 of the Complaint.

316. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 316 of the Complaint.

317. Paragraph 317 contains conclusions of law to which no affirmative response is required.

Response to Count VI: Unfair Acts or Practices

318. In response to the allegations contained in Paragraph 318 of the Complaint, Frontline incorporates by reference the responses to Paragraphs 1-317 contained herein.

319. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 319 of the Complaint.

320. Paragraph 320 contains conclusions of law to which no affirmative response is required.

321. Paragraph 321 contains conclusions of law to which no affirmative response is required.

Response to Count VII: Providing Substantial Assistance to the Debt Collector LLC's Unfair and Deceptive Conduct

322. In response to the allegations contained in Paragraph 322 of the Complaint, Frontline incorporates by reference the responses to Paragraphs 1-321 contained herein.

323. Frontline lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 323 of the Complaint.

324. Paragraph 324 contains conclusions of law to which no affirmative response is required.

325. Paragraph 325 contains conclusions of law to which no affirmative response is required.

**RESPONSE TO PAYMENT PROCESSORS'
ALLEGED VIOLATIONS OF THE CFPA**

Response to Count VIII: Providing Substantial Assistance to the Debt Collectors' Unfair or Deceptive Conduct

326. In response to the allegations contained in Paragraph 326 of the Complaint, Frontline incorporates by reference the responses to Paragraphs 1-325 contained herein.

327. Paragraph 327 contains conclusions of law to which no affirmative response is required.

328. Frontline denies the allegations contained in Paragraph 328 of the Complaint.

329. Frontline denies the allegations contained in Paragraph 329 of the Complaint.

330. Frontline denies the allegations contained in Paragraph 330 of the Complaint.

Response to Count IX: Unfair Acts or Practices

331. In response to the allegations contained in Paragraph 331 of the Complaint, Frontline incorporates by reference the responses to Paragraphs 1-330 contained herein.

332. Frontline denies the allegations contained in Paragraph 332 of the Complaint.

333. Frontline denies the allegations contained in Paragraph 333 of the Complaint.

334. Frontline denies the allegations contained in Paragraph 334 of the Complaint.

335. Frontline denies the allegations contained in Paragraph 335 of the Complaint.

**RESPONSE TO GLOBAL CONNECT'S ALLEGED
VIOLATIONS OF THE CFPA**

Paragraphs 336 through Paragraphs 343 do not contain any allegations against Frontline. To the extent the CFPB sets forth conclusions of law related to certain provisions of the CFPA, those statements of law do not require an affirmative or factual response by Frontline. Count X through Count XI are not alleged against Frontline. To the extent the CFPB asserts that Frontline substantially assisted any acts, conduct, or violations of the FDCPA or CFPA alleged against Global Connect or any other defendant in Count X through Count XI, Frontline affirmatively asserts that it provided no assistance or substantial assistance to any named merchant or defendant, including Credit Power or UDPS. Frontline further affirmatively asserts that the only duties and obligations owed by Frontline with respect to the CFPB's claims, if any, were the contractual duties that Frontline owed to Global Payments pursuant to the terms of the MSA, all of which were Frontline fulfilled.

**Response to Count X: Providing Substantial Assistance to the
Debt Collectors' Unfair or Deceptive Conduct**

336. In response to the allegations contained in Paragraph 336 of the Complaint, Frontline incorporates by reference the responses to Paragraphs 1-335 contained herein.

337. Paragraph 337 contains conclusions of law to which no affirmative response is required.

338. Paragraph 338 contains conclusions of law to which no affirmative response is required.

339. Paragraph 339 contains conclusions of law to which no affirmative response is required.

Response to Count XI: Unfair Acts or Practices

340. In response to the allegations contained in Paragraph 336 of the Complaint, Frontline incorporates by reference the responses to Paragraphs 1-335 contained herein.

341. Paragraph 341 contains conclusions of law to which no affirmative response is required.

342. Paragraph 342 contains conclusions of law to which no affirmative response is required.

343. Paragraph 343 contains conclusions of law to which no affirmative response is required.

RESPONSE TO THIS COURT'S POWER TO GRANT RELIEF

344. Paragraph 344 contains conclusions of law to which no affirmative response is required. To the extent a response is required, Frontline denies the

allegations of Paragraph 344 and denies that the CFPB is entitled to any relief from Frontline.

To the extent relief is sought from Frontline in the “PRAYER FOR RELIEF” section appearing after Paragraph 344 on page 62 of the Complaint, Frontline denies that Plaintiff is entitled to any of the relief sought from Frontline.

* * * * *

Frontline denies each and every allegation of the Complaint not specifically admitted herein.

Together with its answers to the Complaint’s numbered paragraphs and prayer for relief, and without assuming any burden that is not otherwise appropriately placed on it, Frontline pleads the following additional defenses to the Complaint:

AFFIRMATIVE DEFENSES

For its affirmative defenses against the CFPB, Frontline states as follows:

FIRST DEFENSE

The CFPB’s complaint fails to state a claim against Frontline upon which relief which can be granted.

SECOND DEFENSE

Frontline denies that it engaged in any wrongful or unlawful conduct and denies that Plaintiff is entitled to any legal, injunctive, and/or equitable relief from Frontline.

THIRD DEFENSE

The CFPB's claims are barred, in whole or in part, by the doctrines of waiver, laches, estoppel, release, acquiescence and/or ratification.

FOURTH DEFENSE

Frontline did not provide "substantial assistance" to a "covered person" or a "service provider," as those terms are defined by the CFPA.

FIFTH DEFENSE

Frontline is not a "service provider" or a "covered person" as those terms are defined by the CFPA.

SIXTH DEFENSE

The alleged damages were not proximately or legally caused by any act or omission of Frontline. Frontline did not cause any damage and did not cause the consumer harm alleged by the CFPB. Any such harm or damage was caused by intervening forces such as the intentional fraudulent or criminal acts of others.

SEVENTH DEFENSE

Plaintiff's claims against Frontline are barred because the alleged damages were caused, if at all, by parties not within Frontline's control.

EIGHTH DEFENSE

Plaintiff's claims are barred by contract, including but not limited to, the MSA.

NINTH DEFENSE

Plaintiff's claims are barred, in whole or in part, by the contributory or comparative negligence or intentional acts of parties not within Frontline's control.

TENTH DEFENSE

Plaintiff's claims are barred, in whole or in part, because Frontline at all times acted in good faith and in a reasonable manner and at all times acted in substantial compliance with all applicable laws.

ELEVENTH DEFENSE

Plaintiff's claims are barred, in whole or in part, by the doctrine of election of remedies.

TWELFTH DEFENSE

Plaintiff's claims are barred, in whole or in part, by the applicable statutes of limitations.

THIRTEENTH DEFENSE

Frontline has insufficient knowledge or information, at this time, upon which to form a belief as to whether there may be additional defenses and affirmative defenses available to it. Frontline hereby gives notice that it intends to rely upon any other defense that may become available or appear during the proceedings in this case and hereby reserves its rights to amend its Answer and Defenses to assert any such defense, including its right to assert additional defenses that may become known or that may be disclosed during the course of additional investigation and discovery.

JURY DEMAND

Pursuant to Fed. R. Civ. P. 38, Frontline respectfully demands a trial by jury on all issues so triable in this action.

PRAYER FOR RELIEF

WHEREFORE, Frontline requests that this Court grant judgment in its favor on all counts asserted against it in the Complaint and award it its costs and such further relief as may be appropriate and any other relief warranted in law and equity.

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted this 15th day of September, 2015.

**PARKER, HUDSON, RAINER & DOBBS,
LLP**

/s/ Scott E. Zweigel

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Lead Counsel for Frontline Processing Corp.

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2015, I electronically filed the **ANSWER AND AFFIRMATIVE DEFENSES OF DEFENDANT FRONTLINE PROCESSING CORP.** with the Clerk of the Court using the CM/ECF system, which will send notifications of such filings to all counsel of record in this action.

Dated: September 15, 2015

/s/ Scott E. Zweigel
Scott E. Zweigel